



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

VIA FEDERAL EXPRESS

May 15, 2014

James P. Walle, Former Counsel for General Motors Corporation  
c/o General Motors Company  
Mail Code 482-C24-D84  
300 Renaissance Center  
Detroit, MI 48265-3000

Re: Notice of Intent to Issue Special Notice Letters for the Yosemite Slough Site in  
San Francisco, California

Dear James P. Walle:

This letter follows the general notice letter that the U.S. Environmental Protection Agency (EPA) sent to General Motors Corporation on 2/21/2008 in connection with the Yosemite Slough Superfund Site ("the Site"), located in San Francisco, California. In that letter, EPA notified General Motors Corporation of its potential responsibility under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA" or "Superfund"), 42 U.S.C. § 9607(a), for the cleanup of the Site, including all costs incurred by EPA in responding to releases at the Site. EPA is now contacting General Motors Corporation to provide notice of upcoming agency actions.

**Background**

Based on a review of records related to the release and/or disposal of hazardous substances at the Site, EPA identified General Motors Corporation as one of approximately 82 potentially responsible parties (PRPs) that contributed hazardous substances to the Site. Under the federal Superfund law, General Motors Corporation and the other PRPs at the Site are responsible for the costs of cleaning up the Site. EPA has selected a cleanup approach (formally known as a non-time critical removal action) for the Site, which is described in a document called an Action Memorandum issued by EPA on March 17, 2014. The Action Memorandum is available on EPA's website:

<http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/ViewByEPAID/CAN000908486>.

*Received May 16, 2014  
J.P.W. 1:55 p.m.*

### **Intent to Issue Special Notice**

EPA has determined that use of the special notice procedures set forth in Section 122(e) of CERCLA, 42 U.S.C. § 9622(e), may facilitate a settlement between General Motors Corporation, other PRPs, and EPA for activities related to design and/or implementation of the response action. Under Section 122(e), a special notice letter triggers a 60-day moratorium on certain EPA response activities at the Site. During this 60-day moratorium, EPA will not begin response action at the Site. However, EPA reserves the right to take action at the Site at any time should a significant threat to the human health or the environment arise.

When invoking special notice procedures for a non-time critical removal action, EPA's standard practice is to invite all PRPs to participate in formal negotiations with EPA during the 60-day moratorium period in an effort to reach a settlement to conduct or finance the response action at the Site. See EPA Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA (August 1993); EPA Interim Guidance on Notice Letters, Negotiations, and Information Exchange (October 1987).

In this case, EPA understands that a group of PRPs intends to undertake an allocation process to agree on an appropriate division of cleanup costs. EPA appreciates this group's efforts and strongly encourages all PRPs to participate. With the understanding that many PRPs are working in good faith to achieve an allocation, EPA is willing to consider a two-stage special notice procedure. Pursuant to the Action Memorandum, a set of technical design studies is required to be completed before proceeding with design and implementation of the removal action. See Action Memorandum pp. 21, 24. It is anticipated that the technical design studies will require approximately 18 months to complete. EPA is willing to consider an initial special notice settlement with PRPs for completion of these studies. EPA expects that this initial settlement, if reached, would be followed, upon substantial completion of the technical design studies, by issuance of an additional special notice letter providing for the completion of all remaining work related to project design and remedy implementation required by the Action Memorandum.

This letter does not trigger the 60-day special notice moratorium. Rather, EPA is writing to provide you with advance notice of its intention to issue special notice letters to all site PRPs in the near future. Advance notice is being provided to encourage an open process and continued coordination among PRPs.

### **Special Notice Procedures**

During the 60-day moratorium triggered by issuance of each future special notice letter, General Motors Corporation and the other PRPs will be invited to participate in formal negotiations with EPA in an effort to reach a settlement to conduct or finance activities related to design and/or implementation of the response action. The 60-day negotiation moratorium may be extended for an additional 60 days if the PRPs provide EPA with a "good faith offer" to conduct or finance a reasonable portion of the response action design and/or implementation. If EPA determines that your proposal is not a "good faith offer," you will be notified in writing of

EPA's decision to end the moratorium. If settlement is reached between EPA and the PRPs within the extended 120-day negotiation moratorium, the settlement will be embodied in an administrative order on consent (AOC or "Administrative Order").

If a "good faith offer" is not received within 60 days, or if a timely settlement cannot be reached, EPA may take appropriate action at the Site, which may include either of the following options: (1) EPA may fund the non-time critical removal action and pursue a cost recovery claim under 107 of CERCLA against General Motors Corporation and/or the other PRPs; or (2) EPA may issue a Unilateral Administrative Order (UAO) to General Motors Corporation and/or the other PRPs under Section 106(a) of CERCLA, 42 U.S.C. § 9606, requiring General Motors Corporation or them to perform the work described in the Action Memorandum. If the recipients of a UAO refuse to comply with the UAO, EPA may pursue civil litigation against the recipients to require compliance.

### **Good Faith Offer**

A proposed Administrative Order and Statement of Work will be enclosed with each future special notice letter to assist you in developing a "good faith offer." As indicated, the 60-day negotiation moratorium triggered by each letter will be extended for 60 days if the PRPs submit a "good faith offer" to EPA. A "good faith offer" to conduct or finance the remedial action is a written proposal that demonstrates your qualifications and willingness to perform such work and includes the following elements:

- A statement of willingness by the PRPs to complete actions noted in the Action Memorandum within a reasonable timeframe, consistent with EPA's proposed Statement of Work and draft Administrative Order, thus providing a sufficient basis for further negotiations;
- A paragraph-by-paragraph response to EPA's proposed Statement of Work and draft Administrative Order;
- A statement of your willingness and financial ability to implement the actions described in the proposed Statement of Work and that provides a sufficient basis for further negotiation;
- A demonstration of your technical capability to carry out the proposed actions, including identification of the firm(s) that may actually conduct the work or a description of the process that will be undertaken to select the firm(s);
- A detailed statement of work or work plan identifying how you intend to proceed with the proposed actions;
- A statement of your willingness to reimburse EPA for costs EPA will incur in overseeing your implementation of proposed actions;

- A list identifying each party on whose behalf the offer is being made, including name, address, and telephone number of each party; and
- The name, address, and phone number of the party who will represent you in negotiations.

### **PRP Allocation Group**

To assist PRPs in negotiating with EPA concerning this matter, EPA is attaching to this letter a list of the names of PRPs to whom it sent General Notice Letters and is sending this Letter of Intent to Issue Special Notice. *See* Enclosure 1.

A PRP group is being formed to conduct an allocation by PRPs who have received General Notice Letters from EPA notifying them of their potential liability at the Site. EPA encourages you to contact the facilitator for the PRP group to discuss you or your company's involvement with that group. The contact information for the PRP group facilitator is:

Matt Low  
 Matt Low & Associates  
[mlow@mattlowassociates.com](mailto:mlow@mattlowassociates.com)  
 (301) 873-7832

### **Administrative Record**

In accordance with Section 113 of CERCLA, 42 U.S.C. § 9613, EPA has established an Administrative Record containing the documents that serve as the basis for EPA's selection of the appropriate response action for the Site. This Administrative Record is available for inspection and comment at the Superfund Records Center, EPA Region 9, 75 Hawthorne Street, 4<sup>th</sup> Floor, San Francisco. You may wish to review the Administrative Record to assist you in responding to a future special notice letter, but your review should not delay such response beyond the 60-day period provided by CERCLA.

### **Resources and Information for Small Businesses**

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law at <http://www.epa.gov/brownfields/laws/sblbra.htm> and review EPA guidances regarding these exemptions at <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund>.

In addition, if you are a "service station dealer" who accepts used oil for recycling, you may qualify for an exemption from liability under Section 114(c) of CERCLA. EPA guidance regarding this exemption can be found on the Internet at <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund>. If you believe you may qualify for the exemption, please contact Rachel Tennis, EPA Attorney-Adviser, at 75

Hawthorne Street (ORC-3), San Francisco, CA, 94105, (415) 972-3746, [tennis.rachel@epa.gov](mailto:tennis.rachel@epa.gov) to request an application/information request specifically designed for service station dealers.

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources on the Agency's website at <http://www.epa.gov>. In addition, information on contacting EPA's Small Business Ombudsman is available at <http://www.epa.gov/sbo>. Finally, EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA), which can be found at Enclosure 2.

**PRP Response and EPA Contact Person**

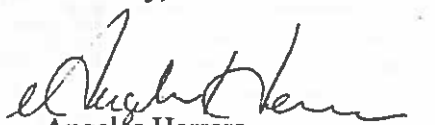
The factual and legal discussions in this letter are intended solely to provide notice and information, and such discussions are not to be construed as a final EPA position on any matter set forth herein. Due to the seriousness of the environmental and legal problems posed by the conditions at the Site, EPA urges that you give immediate attention and prompt response to this letter. Communications in response to this letter should be sent to:

Rachel Tennis  
Attorney-Adviser (ORC-3-4)  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
[Tennis.Rachel@epa.gov](mailto:Tennis.Rachel@epa.gov)  
(415) 972-3746

As you may know, EPA's Remedial Project Manager for Yosemite Slough, Craig Cooper, recently retired. EPA's new Remedial Project Manager for the Site is Yvonne Fong. If you have any questions regarding the technical aspects of this letter, please contact Yvonne at (415) 947-4117.

My staff and I look forward to working with you during the coming months.

Sincerely,

  
Angeles Herrera  
Assistant Director  
Superfund Division

Cc: Andrew Taylor, EPA  
Yvonne Fong, EPA  
Rachel Tennis, EPA

Thanne Berg, EPA  
David Batson, EPA Convening Neutral  
Cassandra Weaver, General Motors Corporation

Enclosures

**ENCLOSURE 1**  
**General Notice Recipient List**

<b>Liabe Party</b>	<b>Operator / Owner / Generator Company</b>
Aerojet-General Corporation	Aerojet Strategic Propulsion Co.
Akzo Nobel Paints LLC	International Paint Co.; U.S. Cellulose; ICI Paints/The Glidden Co.
Alcoa	Reynolds Metals Company
Alfonso and Martha Picazo	Alfonso and Martha Picazo
Allegion plc	Schlage Lock
Anresco, Incorporated	Anresco, Incorporated
Ashland, Inc.	Ashland Chemical Company (a division of Ashland, Inc.)
California Department of Parks and Recreation	California Department of Parks and Recreation
California State Lands Commission	California State Lands Commission
Chemtura	Chemtura
Chevron Corporation	Chevron U.S.A., Inc.; Amoco - Union Chemicals; Union Oil Company of California dba Unocal Corporation; and Purepro Company
City and County of San Francisco	City and County of San Francisco
Cleasby Manufacturing Co., Inc.	Cleasby Manufacturing Co., Inc.
Coca-Cola Refreshments USA, Inc.	The Coca-Cola Company
Delta Air Lines, Inc.	Delta Air Lines, Inc.
Dorsett & Jackson, Inc.	Carmona Chemical (Dorsett & Jackson)
E.I. DuPont de Nemours & Co., Inc.	Dupont
Eureka Chemical Company	Eureka Chemical Company
Eureka Fluid Works	Eureka Fluid Works
ExxonMobil Corporation	Exxon Company, USA
Ford Motor Company	Ford Motor Company
Garza Property Living Trust 2002	Garza Property Living Trust 2002
General Electric Company	General Electric Company
General Motors Corporation	General Motors Corporation
Great Western Chemical Company	Great Western Chemical Company
Haz/Control, Inc.	Haz/Control, Inc. (for South Bay Chemical, Inc.)
Hewlett-Packard Company	Hewlett Packard
Honeywell International, Inc.	Baron Blakeslee, Inc. [Allied Signal]
Intel Corporation	Intel Corporation
International Paper Company	International Paper Company [for Stecher-Traung-Schmidt]
Inter-State Oil Company	Interstate Oil
ITW PMI Investments, Inc.	Stero Company
Kaiser Aluminum & Chemical Corp.	Kaiser Aluminum
Kelly Moore Paint Company, Inc.	Kelly Moore Paint Co. Inc
Lockheed Martin Corporation	Lockheed Missles
Maxus Energy Corporation	Diamond Shamrock
McKesson Corporation	McKesson Chemical
Micro-Tracers Inc.	Micro-Tracers Inc.
Monsanto Company	Monsanto Company
NL Industries, Inc.	Spencer Kellogg
Northrop Grumman Corporation	Litton Industries
Olympian Oil Co.	Olympian Oil Co.
Owens-Illinois, Inc.	Owen Illinois (Brockway Glass)
Pacific Gas & Electric Company	Pacific Gas & Electric Company
Pacific Scientific Energetic Materials Company	Teledyne
Peninsula Oil Company	Peninsula Oil Company
Pennzoil-Quaker State Company	Pennzoil Company; Quaker State Oil
Perez Auto and Truck Painting and Suarez Auto Repair, a California General Partnership	Perez Auto and Truck Painting and Suarez Auto Repair, a California General Partnership
R.J. McGlennon Company, Inc.	R.J. McGlennon Company, Inc. (MacLac)

<b>Liabe Party</b>	<b>Operator / Owner / Generator Company</b>
Redding Petroleum, Inc.	Redding Petroleum aka Industrial Oil
Redwood Oil Company	Redwood Oil Company
Reichhold, Inc.	Reichhold Chemicals, Inc.
Ricci and Kruse Lumber Company	Ricci and Kruse Lumber Company
Roche Palo Alto LLC	Syntex Labs
Rochester Midland Corporation	Bytech Chemical
Rohm & Haas Company	Rohm & Haas Company
Romic Environmental Technologies Corporation	Romic Chemical
RWD Associates, LLC	RWD Associates, LLC
San Francisco Bay Area Rapid Transit District	Bay Area Rapid Transit District
Sequa Corporation	General Printing Ink (Sequa Corp.)
Shell Oil Company	Shell Oil
Simpson Coatings Group, Inc.	Simpson Coatings (Organic Coatings)
Stanford University	Stanford University
Syngenta Crop Protection, Inc.	Zoecon Corp.
Tap Plastics, Inc.	Tap Plastics, Inc. (Chemco)
TE Connectivity	Raychem Corporation
Textron, Inc.	Spencer Kellogg
The Dow Chemical Company	Dow Chemical
The O'Brien Corporation	O'Brien Corp. [Fuller O'Brien Paints]
The Sherwin-Williams Company	Sherwin-Williams
Tony J. Hwang	Tony J. Hwang
TriMas Corporation	Norris Industries (Riverbank Ammo plant)
Union City Chemicals Incorporated	Union City Chemicals
United Air Lines, Inc.	United Air Lines, Inc.
United States Defense Reutilization Marketing Service	Defense Property Disposal
United Technologies Corporation	United Technologies Corporation
Univar USA Inc.	Van Waters & Rogers, Inc./Vopak Distribution Americas Corporation; Chem Central
University of California	Lawrence Berkeley Lab; U.C. Regents; and Univ. of California, San Francisco
W.R. Grace & Company	W.R. Grace/Dewey Almy
W.R. Meadows, Inc.	W.R. Meadows, Inc.
WDC Liquidating Inc.	Waymire Drum Co.



## **U.S. EPA Small Business Resources Information Sheet**

The United States Environmental Protection Agency provides an array of resources, including workshops, training sessions, hotlines, websites and guides, to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

### **EPA's Small Business Websites**

Small Business Environmental Homepage - [www.smallbiz-enviroweb.org](http://www.smallbiz-enviroweb.org)

Small Business Gateway - [www.epa.gov/smallbusiness](http://www.epa.gov/smallbusiness)

EPA's Small Business Ombudsman - [www.epa.gov/sbo](http://www.epa.gov/sbo) or 1-800-368-5888

#### **EPA's Compliance Assistance Homepage**

[www.epa.gov/compliance/assistance/  
business.html](http://www.epa.gov/compliance/assistance/business.html)

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

#### **EPA's Compliance Assistance Centers** [www.assistancecenters.net](http://www.assistancecenters.net)

EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

#### **Agriculture** [www.epa.gov/agriculture/](http://www.epa.gov/agriculture/)

#### **Automotive Recycling** [www.ecarcenter.org](http://www.ecarcenter.org)

#### **Automotive Service and Repair** [www.ccar-greenlink.org](http://www.ccar-greenlink.org) or 1-888-GRN-LINK

#### **Chemical Manufacturing** [www.chemalliance.org](http://www.chemalliance.org)

#### **Construction** [www.cicacenter.org](http://www.cicacenter.org) or 1-734-995-4911

#### **Education** [www.campuserc.org](http://www.campuserc.org)

#### **Food Processing** [www.speac.org](http://www.speac.org)

#### **Healthcare** [www.hercenter.org](http://www.hercenter.org)

#### **Local Government** [www.lgcan.org](http://www.lgcan.org)

#### **Metal Finishing** [www.nmfrc.org](http://www.nmfrc.org)

#### **Paints and Coatings** [www.paintcenter.org](http://www.paintcenter.org)

#### **Printed Wiring Board Manufacturing** [www.pwbr.org](http://www.pwbr.org)

#### **Printing** [www.pneac.org](http://www.pneac.org)

#### **Ports** [www.portcompliance.org](http://www.portcompliance.org)

#### **U.S. Border Compliance and Import/Export Issues** [www.bordercenter.org](http://www.bordercenter.org)

#### **Hotlines, Helplines and Clearinghouses** [www.epa.gov/epahome/hotline.htm](http://www.epa.gov/epahome/hotline.htm)

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

#### **Antimicrobial Information Hotline** [info-antimicrobial@epa.gov](mailto:info-antimicrobial@epa.gov) or 1-703-308-6411

#### **Clean Air Technology Center (CATC) Info-line** [www.epa.gov/ttn/catc](http://www.epa.gov/ttn/catc) or 1-919-541-0800

#### **Emergency Planning and Community Right-To-Know Act** [www.epa.gov/superfund/resources/ infocenter/epcra.htm](http://www.epa.gov/superfund/resources/infocenter/epcra.htm) or 1-800-424-9346

#### **EPA Imported Vehicles and Engines Public Helpline** [www.epa.gov/otaq/imports](http://www.epa.gov/otaq/imports) or 734-214-4100

#### **National Pesticide Information Center** [www.npic.orst.edu/](http://www.npic.orst.edu/) or 1-800-858-7378

#### **National Response Center Hotline - to report oil and hazardous substance spills** [www.nrc.uscg.mil](http://www.nrc.uscg.mil) or 1-800-424-8802

#### **Pollution Prevention Information Clearinghouse (PPIC)** [www.epa.gov/opptintr/ppic](http://www.epa.gov/opptintr/ppic) or 1-202-566-0799

#### **Safe Drinking Water Hotline** [www.epa.gov/safewater/hotline/index. html](http://www.epa.gov/safewater/hotline/index.html) or 1-800-426-4791

#### **Stratospheric Ozone Protection Hotline** [www.epa.gov/ozone](http://www.epa.gov/ozone) or 1-800-296-1996



## U. S. EPA Small Business Resources

**Toxic Substances Control Act (TSCA) Hotline**  
[tsc hotline@epa.gov](mailto:tsc hotline@epa.gov) or 1-202-554-1404

**Wetlands Information Helpline**  
[www.epa.gov/owow/wetlands/wetline.html](http://www.epa.gov/owow/wetlands/wetline.html) or 1-800-832-7828

### State and Tribal Web-Based Resources

**State Resource Locators**  
[www.envcap.org/statetools](http://www.envcap.org/statetools)

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

**State Small Business Environmental Assistance Programs (SBEAPs)**  
[www.smallbiz-enviroweb.org](http://www.smallbiz-enviroweb.org)

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits. The website is a central point for sharing resources between EPA and states.

**EPA's Tribal Compliance Assistance Center**  
[www.epa.gov/tribalcompliance/index.html](http://www.epa.gov/tribalcompliance/index.html)

The Center provides material to Tribes on environmental stewardship and regulations that might apply to tribal government operations.

**EPA's Tribal Portal**  
[www.epa.gov/tribalportal/](http://www.epa.gov/tribalportal/)

The Portal helps users locate tribal-related information within EPA and other federal agencies.

### EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

**EPA's Small Business Compliance Policy**  
[www.epa.gov/compliance/incentives/smallbusiness/index.html](http://www.epa.gov/compliance/incentives/smallbusiness/index.html)

This Policy offers small businesses special incentives to come into compliance voluntarily.

**EPA's Audit Policy**  
[www.epa.gov/compliance/incentives/auditing/auditpolicy.html](http://www.epa.gov/compliance/incentives/auditing/auditpolicy.html)

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

### Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247), or go to their website at [www.sba.gov/ombudsman](http://www.sba.gov/ombudsman).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

### Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

*EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.*

# FedEx

## Express

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1300 CLAY STREET  
SUITE 450  
OAKLAND, CA 94612  
UNITED STATES US

SHIP DATE: 15MAY14  
ACTWT: 1.0 LB 14.00Z  
CNO: 0844524/CAF12704

BILL SENDER

TO JAMES P. WALLE  
C/O GENERAL MOTORS COMPANY  
MAIL CODE 482-C24-D84  
300 RENAISSANCE CENTER  
DETROIT MI 48265

REF: 9025-005



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